

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, CRIMINAL PART
CAMDEN COUNTY, NEW JERSEY
PETITION NO. 0415XTR2019000001
APP. DIV. NO. _____

STATE OF NEW JERSEY,	:	
	:	
Plaintiff,	:	TRANSCRIPT
	:	
v.	:	OF
	:	
DAVID GRECO,	:	CIVIL HEARING
	:	
Defendant.	:	
	:	

PLACE: Camden County Hall
of Justice
101 S. 5th Street
Camden, New Jersey 08103

DATE: September 6, 2019

BEFORE:

THE HONORABLE EDWARD McBRIDE, J.S.C.

TRANSCRIPT ORDERED BY:

DAVID GRECO (246 Orchard Ave., Somerdale, NJ
08083)

APPEARANCES:

NEVAN SOUMILAS, ESQUIRE (Assistant Prosecutor)
Attorney for the State of New Jersey

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I N D E X
9/6/19

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1 (Proceeding begins at 10:07 a.m.)
 2 THE COURT: All right. The matter before the
 3 Court is in the matter of respondent David M. Greco,
 4 G-R-E-C-O. It comes under a petition for a temporary
 5 extreme risk protective order, Petition No. 0415XTR
 6 2019 with five zeros and the number 1, petitioner being
 7 law enforcement officer or agency. And, therefore, in
 8 accordance with the attorney general directive
 9 implementing this statute, counsel is here from the
 10 Prosecutor's Office. Counsel, your appearances please
 11 -- your appearance, please.

12 MS. SOUMILAS: Good morning, Your Honor.
 13 Nevan Soumilas, assistant prosecutor, on behalf of the
 14 State.

15 THE COURT: Okay. This is a civil proceeding
 16 under the statute. The petition was filed
 17 electronically, as all of them are, yesterday. Brought
 18 to this Court's attention late in the day yesterday in
 19 light of the fact that the petition makes reference to
 20 additional documentation, including video evidence
 21 concluded that it was not feasible to conduct a
 22 proceeding at 4:15 or 4:30 yesterday afternoon, and
 23 instead scheduled for this morning. And I do
 24 appreciate people being here promptly to conduct the
 25 proceeding.

5

1 And, Ms. Soumilas, do you have the petitioner
 2 to testify and also -- the Court is permitted to act on
 3 these types of petitions under the statute and under
 4 the AOC guidelines based solely on the papers. In this
 5 instance, I believe it is appropriate to go further
 6 than that, and to hear evidence from the petitioner, as
 7 well as from anyone else who has information who is
 8 here in court today relevant to the petition itself.

9 So, Ms. Soumilas, go ahead.

10 MS. SOUMILAS: Thank you, Your Honor. I do
 11 have here Detective Lauren Laielle, L-A-I-E. And I can
 12 represent to the Court that she's represented by the
 13 New Jersey Homeland Security, not the Federal version.
 14 I asked her.

15 THE COURT: I see.

16 MS. SOUMILAS: She's in New Jersey -- she's
 17 employed by the State of New Jersey, and she has arrest
 18 powers in New Jersey.

19 I also have with me Sergeant Frank Pace, from
 20 the Gloucester Township Police Department, which is the
 21 town in which the respondent resides.

22 THE COURT: Okay.

23 MS. SOUMILAS: Your Honor, we are making
 24 application under 2C:58-20 et al, and we have probable
 25 cause to believe that Mr. Greco poses a danger of

6

1 bodily injury to self or others by possessing or
2 purchasing firearms.

3 I would like to make a slight amendment to
4 the petition. We will be providing the Court with
5 testimony of the interaction between Detective Laielli
6 and Sergeant Pace at the home of Greco on August the
7 5th of 2018, in lieu of relying on the body-worn camera
8 interview.

9 THE COURT: Okay.

10 MS. SOUMILAS: We will be providing the Court
11 with exhibits of the social media posts on Gab, which
12 the State is relying on for its petition.

13 THE COURT: Okay.

14 MS. SOUMILAS: So that would be our
15 amendment.

16 THE COURT: That's fine. Let's proceed with
17 testimony from the detective from New Jersey Homeland
18 Security.

19 (Witness present)

20 MS. SOUMILAS: Detective, come and get sworn.

21 THE COURT: Yes.

22 MS. SOUMILAS: And please tell us how to
23 pronounce your name properly.

24 THE COURT: Yes. Up here. If you could step
25 up. Before you take your seat, the clerk will

7

1 administer the oath to you. You can get up on the
2 stand there.

3 THE CLERK: Raise your right hand, please.
4 State your name for the record.

5 THE WITNESS: Detective Lauren Laielli, L-A-
6 I-E-L-L-I.

7 THE CLERK: Thank you.

8 D E T. L A U R E N L A I E L L I, STATE'S WITNESS,
9 SWORN

10 THE WITNESS: Good morning, Judge.

11 THE COURT: Good morning.

12 DIRECT EXAMINATION BY MS. SOUMILAS:

13 Q Detective, can you please tell us by whom
14 you're employed.

15 A I am employed with the New Jersey office of
16 Homeland Security and Preparedness.

17 Q And do you have arrest powers in the State of
18 New Jersey?

19 A I do.

20 Q Have you, in fact, made arrests in New
21 Jersey?

22 A Yes.

23 Q Are you on a task force right now?

24 A Yes.

25 Q What task force is that?

8

1 A I'm currently assigned to the FBI joint terrorism
2 task force.

3 Q Okay. And still have arrest powers in New
4 Jersey?

5 A Yes. That's correct.

6 Q Okay. I'm going to direct your attention to
7 late July, early August of 2019. Did you begin to
8 conduct an investigation into online posts made by a
9 David M. Greco, with a date of birth of 3/12?

10 MS. SOUMILAS: I'll leave the year out for
11 records purposes, Your Honor.

12 THE COURT: Uh-huh.

13 BY MS. SOUMILAS:

14 Q But is that date of birth contained in your
15 petition?

16 A That's correct.

17 Q And did you begin an investigation as to the
18 posts made by Greco?

19 A That is correct.

20 Q What kind of website were those posts on?

21 A The posts were made on a website called Gab.

22 THE COURT: Uh-huh.

23 A It's used by individuals who share similar
24 ideologies, which tend to be far to the right and white
25 supremacist in nature.

9

1 THE COURT: Uh-huh.

2 BY MS. SOUMILAS:

3 Q Okay. And did you create -- have to create
4 an account in order to view those posts or were they
5 public?

6 A They were public.

7 Q Okay. And did you view those posts?

8 A Yes.

9 Q And what were the nature of some of the posts
10 that led you to further investigate Greco?

11 A A lot of his posts were extremely anti-Semitic,
12 but on top of that there was a lot of veiled threats
13 for violence against various populations, mostly the
14 Jewish population.

15 Q Okay. And did you review over 100 posts?

16 A Yes.

17 Q Okay. And after reviewing those posts, what
18 was the next step that you took?

19 A I then issued a preservation request to Gab.

20 Q Okay. Were there other -- and when you
21 issued the preservation request, what did you do next?

22 A After that, I spoke with Mr. Greco's employer.

23 Q And who was that?

24 A That was Mr. Griffin.

25 Q And where is Mr. Greco employed?

10

1 A He's employed with an individual who owns a
2 private school bus transportation business.

3 Q And what does he do for that company?

4 A He's a school bus driver. He's described to me by
5 his employer as driving minivans that contain children,
6 and he drives them to various schools.

7 Q And when you spoke to Mr. Griffin, what
8 information -- what relevant information did he
9 provide?

10 A Mr. Griffin informed me that Mr. Greco has been
11 employed with him since about 2014. And it's extremely
12 hard to -- Mr. Griffin told me it's extremely hard to
13 get bus drivers. So he's kept Griffin -- Greco
14 employed even though he has received complaints about
15 Greco's aggressive driving. And he had a demeanor
16 complaint in regards to a confrontation he got into
17 with a school employee.

18 In addition, he told me that Mr. Greco has an
19 extreme temper, and he gets angry easily.

20 Q And what was the date of that interview, if
21 you recall?

22 A That was August 5th, I believe.

23 Q Of 2019?

24 A Yes.

25 Q Okay. What did you do after that interview?

11

1 A After that interview, I decided it was necessary
2 to interview Mr. Griffith -- Mr. Greco.

3 Q Okay. And where did -- did you interview him
4 on that date?

5 A I did.

6 Q And where did you interview him?

7 A I interviewed him at his home.

8 Q And what was his demeanor at his home?

9 A He was -- he was very articulate in the way he
10 spoke, but he was very passionate. And I would
11 describe his demeanor as angry.

12 Q Okay. Was he angry about your visit?

13 A Yes.

14 Q Subsequent to your visit -- we'll go back to
15 your visit. Subsequent to your visit, did you continue
16 to monitor posts by David Greco on Gab?

17 A I did.

18 Q Did he make reference to the visit by what he
19 believed to be an FBI agent to his home to inquire
20 about his posts?

21 A Yes.

22 Q And what was the nature of that post?

23 A He had made a post -- I don't remember the exact
24 content of the post, but it was something along the
25 lines of that the FBI is controlled by the Jews, or

12

1 that we're extremely intelligent, and we know what
 2 we're doing, and we're trying to take away his -- I
 3 don't remember the exact.

4 Q Okay. Were there posts that you were able to
 5 monitor in which Mr. Greco espouses ideas about right
 6 to bear arms and the right of people under the second
 7 amendment?

8 A Yes.

9 Q And how many of those did you view?

10 A Over a hundred.

11 Q Over a hundred. Okay. So getting back to
 12 your visit, you said --

13 THE COURT: Excuse me. Those are the posts
 14 you referred to earlier?

15 THE WITNESS: She asked me generally.

16 THE COURT: Uh-huh.

17 THE WITNESS: It was probably over 1,000 that
 18 I viewed total, and then over a hundred of just
 19 specifically about guns.

20 THE COURT: And over a hundred both before
 21 you interviewed him and after you interviewed him?

22 THE WITNESS: Yes.

23 THE COURT: Okay.

24 MS. SOUMILAS: Okay.

25 BY MS. SOUMILAS:

13

1 Q And you indicated that he was passionate and
 2 angry. What is it that he was angry about?

3 A He thinks that our society needs to be saved from
 4 the Jewish people who are ruining it. He was angry
 5 that we were there. He believed that he didn't need to
 6 be interviewed. He informed me that he was, you know,
 7 simply waking people up on the internet. And he also
 8 stated that he believes that force or violence is
 9 necessary to re-align our society, to take away the
 10 power from the Jewish people.

11 And he also got angry when I would make
 12 comments about, you know, I don't think what you're
 13 posting is, you know, of a sane mind. And then he
 14 repeatedly asked me multiple times if I thought he was
 15 insane, and he grew very agitated.

16 Q He grew agitated at the thought that he might
 17 be viewed as insane?

18 A Yes.

19 Q Okay. Now, what -- did you inquire of Greco
 20 whether or not he possessed weapons?

21 A I did not.

22 Q Okay. Did you -- were any -- who does he
 23 live with?

24 A He lives with his elderly parents.

25 Q Were they present?

14

1 A They were. They were the ones that let us in the
2 house.

3 Q Okay.

4 A When we initially went to the house and we were
5 banging on the door, he didn't come to the door. And
6 then his parents drove up probably about, you know,
7 five to ten minutes later and they let us in, and he
8 was in the home.

9 Q So at the time that you were banging on the
10 house, do you have reason to believe he was in the
11 home?

12 A Yes.

13 Q Were you in a marked vehicle or an unmarked
14 vehicle?

15 A We were mostly on foot, but I was -- it was
16 myself, a special agent from the FBI, and multiple
17 uniformed police officers.

18 Q Were there marked vehicles outside?

19 A Yes.

20 Q So would it be evident to someone in the
21 house that there was law enforcement outside?

22 A Oh, yes. As soon as the mother and father drove
23 up, they were worried and asking what was going on.

24 Q I guess my question is were the marked
25 vehicles viewable from inside the house if someone was

15

1 in the house?

2 A Yes. Absolutely.

3 Q Okay. And when you knocked on the door, what
4 announcements did you make?

5 A Police. Answer. Police.

6 Q Okay.

7 A Come to the door. We called his name. We even
8 went -- the uniformed officers went to the rear of the
9 house and knocked on that door. We knocked on windows.

10 Q All right. When his parents came home and
11 they let you in, did he make himself known or did you
12 have to call him down?

13 A We had to call him down and, in fact, his father
14 had to go upstairs to get him.

15 Q Okay. So he didn't come down after your
16 commands.

17 A No.

18 Q Okay. And did you interview the parents?

19 A No.

20 Q Do you have reason to believe that there's
21 guns in the home?

22 A Yes.

23 Q And how do you have that information?

24 A Through an NCIC check of his firearms records. He
25 has a rifle and a pistol.

16

1 Q Okay. Did you communicate with anyone that
2 would lead you to believe that those weapons are inside
3 the home where you interviewed him?

4 A I know that another officer from the PD did speak
5 to the father, who indicated that he knows he has guns
6 in the house.

7 Q Okay. And what is the address that you went
8 to for the interview?

9 A I'm not -- I'm sorry. Orchard Avenue. I'm not
10 sure of the --

11 Q It's in Gloucester Township?

12 A It's in Somerdale, which is in Gloucester
13 Township.

14 MALE SPEAKER: The Somerdale section.

15 MS. SOUMILAS: What?

16 MALE SPEAKER: The Somerdale section.

17 MS. SOUMILAS: The Somerdale section.

18 THE COURT: Let me -- I have a question. Let
19 me go back to the NCIC check. The NCIC check revealed?

20 THE WITNESS: Two firearms.

21 THE COURT: That he had purchased two
22 firearms?

23 THE WITNESS: Yes.

24 THE COURT: Okay.

25 MS. SOUMILAS: We'll be taking additional

17

1 testimony from a separate witness.

2 BY MS. SOUMILAS:

3 Q A rifle and a handgun you indicated; correct?

4 A Yes.

5 Q Did it indicate that he had a permit to
6 purchase?

7 A I can't recall.

8 Q Okay. Or a permit to carry?

9 A No --

10 Q No --

11 A Not that I can recall.

12 Q Okay. But there was information relayed to
13 you that those weapons were in the house.

14 A Yes.

15 Q Did that cause you to do anything?

16 A That caused me to be alarmed. It also caused me
17 to discuss with Gloucester Township and your office
18 about this extreme risk protection order prior to its
19 enactment.

20 Q Okay. And so this was in early August of
21 2019. And to your knowledge, the act wasn't in effect
22 until September 1st.

23 A That is correct. I even conferred with the DAG in
24 the State Attorney General's Office to see if it was
25 possible to push it up, and it was not.

18

1 Q Okay. And from August 5th -- is that the sum
2 of your interaction with David Greco that day?

3 A That day, yes.

4 Q Did you have other interactions with him?

5 A No.

6 Q Okay. And anyone else that you interviewed
7 besides his employer and him?

8 A No.

9 Q Okay. From August 5th of 2019 til today,
10 have his communications continued to be monitored?

11 A Yes.

12 Q Okay. And have there been additional recent
13 posts, after the post about your visit, which would
14 espouse those ideas regarding anti-Semitism?

15 A Yes.

16 Q And have you reviewed those posts with me
17 today?

18 A Yes.

19 Q Okay. And prior to today; correct?

20 A Yes.

21 Q All right. And did you prepare yesterday a
22 petition under the temporary -- a petition for
23 temporary extreme risk protection order?

24 A Yes.

25 MS. SOUMILAS: Does the Court have a copy of

19

1 that petition in front of it?

2 THE COURT: Yes, I do.

3 MS. SOUMILAS: Okay. I have premarked
4 everything except for the petition, Judge. So I'm
5 going to go ahead and ask if I could mark that my last
6 exhibit, which would be S-16.

7 THE COURT: That's fine. In the meantime,
8 let me ask. Detective, the NCIC check, did you run
9 that check before you conducted the interview of Mr.
10 Greco?

11 THE WITNESS: That is correct.

12 THE COURT: Okay. And you knew the results
13 of that check before you went to see him?

14 THE WITNESS: Yes.

15 THE COURT: Okay.

16 THE WITNESS: That's --

17 THE COURT: Uh-huh.

18 BY MS. SOUMILAS:

19 Q Did that -- was that one of the reasons why
20 you did not make a specific request of whether or not
21 he had weapons?

22 A Yes.

23 Q Did you have any concern for safety of
24 yourself or officers on-scene?

25 A We did.

20

1 Q At that point, did you know where the weapons
2 were in the house?

3 A No.

4 Q Okay. Before a detective -- before some
5 officer talked to his father, did you know where the
6 weapons were at all?

7 A No.

8 Q And once you had learned that it was in the
9 house, did that cause you to then retreat? Maybe
10 retreat is not the right word, but to end your
11 interview at that time?

12 A We did end it abruptly, but there were multiple
13 reasons for the abrupt ending. Mostly because Mr.
14 Greco was becoming very agitated, and he wasn't
15 answering questions that we were asking.

16 Q Okay. All right.

17 MS. SOUMILAS: If I may approach, Your Honor.

18 THE COURT: Yes, you may.

19 BY MS. SOUMILAS:

20 Q I'm going to show you what's been marked as
21 State's Exhibit 16. Would you take a look at that.

22 A Yes.

23 Q Is that the petition for a temporary extreme
24 risk protection order that you filed yesterday?

25 A It is.

21

1 Q Are you the affiant?

2 A Yes.

3 Q It says New Jersey Homeland Security, but was
4 it actually prepared by you?

5 A It was.

6 Q And was it prepared by you in conjunction
7 with a Gloucester Township law enforcement officer?

8 A It was.

9 Q Who was that?

10 A It was Sergeant Pace.

11 Q Okay. Now -- and is the information in the
12 petition true and accurate?

13 A Yes.

14 Q We're going to talk about the Gap posts in a
15 minute, but the body-worn camera footage, would that,
16 in essence, show the recitation that you gave us today
17 of your interview with Greco?

18 A Yes.

19 Q Okay. All right. So I'm going to show you a
20 series of posts.

21 MS. SOUMILAS: We would submit S-16 into
22 evidence, Judge. I'm just going to leave it here.

23 THE COURT: Yes. It's -- it is in evidence.

24 MS. SOUMILAS: Okay.

25 BY MS. SOUMILAS:

22

1 Q I'm going to show you S-1. Can you take a
2 look and tell us what S-1 is?

3 A S-1 is a collection of screenshots from David
4 Greco's Gab account.

5 Q Okay. And do you know the approximate date
6 of those?

7 A These were retrieved in June of 2019.

8 Q And that would have been prior to you making
9 his -- the home visit; is that correct?

10 A That's correct.

11 Q All right. And does he state on page 1 --
12 and, by the way, you've seen Greco, so you know what he
13 looks like.

14 A Yes.

15 Q When you go on his Gab account, is there a
16 profile picture?

17 A It is.

18 Q Is that, in fact, the David Greco that you
19 met with?

20 A Yes.

21 Q And actually his name on the Gab is
22 @DavidGreco33; is that correct?

23 A @DaveGreco33.

24 Q @DaveGreco33. Okay.

25 A Yes.

23

1 Q And when you met with him on August 5th, he
2 did not deny that those posts were his; is that
3 correct?

4 A No, he did not.

5 Q He didn't. Go ahead.

6 A In fact, the way that we know it's David Greco is
7 his IP address.

8 Q Oh. So you linked it to his IP address?

9 A Yes.

10 Q Did that come back to his residence.

11 A Yes.

12 Q In the Somerdale section of Gloucester
13 Township?

14 A Yes.

15 Q All right. On page 1 of S-1, does it
16 indicate that "The Jewish power over our nation must be
17 destroyed"?

18 A Yes.

19 Q And does it say, "Face and destroy the Jewish
20 plague"?

21 A Yes.

22 Q Okay. And on page 2 of S-2, does it
23 indicate, "Anti-American, non-white, welfare
24 professionals will not stop accepting free housing or
25 free money from the Jews to live and breed in America

24

1 unless every foreign invader is killed. So the rest
 2 think twice about coming here to help to destroy them"?
 3 Is he advocating assistance -- recruiting assistance
 4 for killing Jews?

5 A Yes.

6 Q Okay. And also on page 2, does he say,
 7 "Killing the enemy of our nation and your people is
 8 correct, just and necessary"?

9 A Yes.

10 Q Okay. Now, does he say on page 3 of S-3,
 11 obliterating any and all Jewish power is the only way
 12 to make our people safe?

13 A That's correct.

14 Q Okay. Now, on page 4, is there a reference
 15 to James Egbert?

16 A Yes.

17 Q And who is James Egbert?

18 A James Egbert is -- well, the reference to James
 19 Egbert's post is to Tarrant, who is the New Zealand
 20 shooter.

21 Q Okay. The -- Brenton Tarrant?

22 A Yes.

23 Q Okay. And reference to Tarrant -- who is
 24 Tarrant?

25 A Tarrant is the individual who shot the individuals

25

1 in the mosque in New Zealand.

2 Q Okay. And does he say that "Tarrant is a
 3 brave man to give his life for one reason"?

4 A That's correct.

5 Q Okay.

6 MS. SOUMILAS: The State would move to admit
 7 S-1, Your Honor. If you could pass that up.

8 THE COURT: All right. S-1 is admitted.

9 MS. SOUMILAS: Okay.

10 THE COURT: There's proper foundation laid.

11 BY MS. SOUMILAS:

12 Q Okay. Again, S-2. Can you take a look at
 13 S-2. What is S-2?

14 A S-2 is another screen grab of David Greco's Gab
 15 account from April 27th, 2019.

16 Q And does he make a reference to a synagogue
 17 shooting by a Hispanic male?

18 A Yes.

19 Q Okay. And does he make a reference to "This
 20 time, Jews who are enemies of America and running white
 21 genocide got shot in San Diego"? Does he make that
 22 reference?

23 A Yes.

24 Q And does he continue to say, "America needs
 25 to issue arms to all white people to make it easier for

26

1 us to destroy our domestic enemy”?

2 A That is correct.

3 Q And based on the context of that, is he
4 referring to Jewish people?

5 A Yes.

6 Q And is -- was there, in fact, prior to April
7 27th of 2019, a massacre in a synagogue by a Hispanic
8 male?

9 A That is correct.

10 Q Okay.

11 MS. SOUMILAS: And S-2 into evidence, Your
12 Honor.

13 THE COURT: It is admitted in evidence.

14 BY MS. SOUMILAS:

15 Q S-3. And what is S-3?

16 A S-3 is another screen grab from David Greco
17 approximately on August 15th.

18 Q And is this one a reference about gun
19 control? Oh, no. I'm sorry. Does he make a reference
20 to something -- someone posted about gun control, and
21 he makes a reference, "Many have no idea of the horrors
22 that will await us if we don't unify and prepare for
23 battle against our enemies, because they are
24 preparing"?

25 A Yes, that's correct.

27

1 Q Okay.

2 A When he puts the three parentheses around the
3 they, that is a common tactic which is used by white
4 supremacists to identify Jewish people. They'll put it
5 around they or other Jewish institutions such -- you
6 know, in their mind, the bank, the federal reserve, et
7 cetera.

8 So he's stating that we don't unify and
9 prepare for battle against our enemies because -- and
10 then the they -- the Jewish people are preparing.

11 THE COURT: Uh-huh.

12 BY MS. SOUMILAS:

13 Q And is this based on your experience in
14 conducting these kinds of investigations?

15 A Yes.

16 Q And how many years of experience do you have
17 in that?

18 A I have been a law enforcement officer for almost
19 ten years, and I have been solely investigating
20 domestic terrorism for four and a half years.

21 Q Okay. And have you seen that they with three
22 parentheses in the past?

23 A Yes.

24 Q Okay. All right.

25 MS. SOUMILAS: S-3 into evidence, Your Honor.

28

1 THE COURT: Is it admitted.
 2 BY MS. SOUMILAS:
 3 Q S-4. What's S-4?
 4 A S-4 is again another screen grab from David
 5 Greco's Gab account. This is from April 25th of 2019.
 6 Q And in that post, does he make reference to
 7 "Carpet bombing this country for the Muslim invaders in
 8 Europe, raping white women"?
 9 A That's correct.
 10 Q Okay. And does he also make reference to
 11 FBI?
 12 A Yes.
 13 Q And does it say the FBI should have been
 14 arrested for treasonist activity --
 15 A Yes.
 16 Q -- for protecting Jewish -- Jews and bio-
 17 weapons?
 18 A That is correct.
 19 Q Okay. And was that posted by him on his
 20 account of DaveGreco33?
 21 A Yes.
 22 Q Okay.
 23 MS. SOUMILAS: S-4, please, into evidence,
 24 Your Honor.
 25 THE COURT: It is admitted.

29

1 MS. SOUMILAS: Okay.
 2 BY MS. SOUMILAS:
 3 Q S-5. Okay. Was this -- I'm sorry. Did I
 4 ask you about -- and on S-3, does it indicate that
 5 that's on April 25th?
 6 A Yes.
 7 Q Okay. S --
 8 THE COURT: S-4 is April 25th.
 9 MS. SOUMILAS: That was S-4.
 10 THE COURT: Uh-huh.
 11 MS. SOUMILAS: Yes.
 12 BY MS. SOUMILAS:
 13 Q S-5, what's the date on that?
 14 A I'm not sure. I think I have -- oh, there we go.
 15 August --
 16 Q I'm sorry. I gave you the copy.
 17 A That's okay.
 18 Q I needed that one.
 19 A This one is dated August 2nd, 2019.
 20 Q Okay. And does that one -- is that posted
 21 from David Greco?
 22 A That is correct.
 23 Q And he's commenting on somebody else?
 24 A Yes.
 25 Q And he says, "The days of the Jewish commie

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1 filth being safe in the nation they pervert leach are
 2 attempting to destroy are over, boy." Is that correct?

3 A Yes.

4 Q And then he has a quote from Theodore
 5 Kaufman?

6 A Yes.

7 Q Okay.

8 MS. SOUMILAS: S-4, Your Honor.

9 THE COURT: S-5, I think.

10 MS. SOUMILAS: Oh, it's S-5. I'm sorry.
 11 S-5.

12 THE COURT: It's admitted. It is admitted.
 13 BY MS. SOUMILAS:

14 Q S-6. What's the date on S-6?

15 A This is August 8th, 2019.

16 Q Okay. And is that posted by David Greco?

17 A This is -- yes.

18 Q And is that a reference to gun control?

19 A Yes.

20 Q And does he say, "Anyone who betrays the
 21 Constitution and tries to take away one's rights and
 22 guns is a dangerous enemy to our nation and should be
 23 treated as such"?

24 A That is correct.

25 Q And was he espousing those kinds of beliefs

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1 when you went to see him on August 5th?

2 A Yes.

3 Q Did he make reference to guns specifically
 4 when you met with him?

5 A Yeah. I can't -- I can't recall.

6 Q Can't recall. Okay.

7 MS. SOUMILAS: S-6 into evidence, Your Honor.

8 THE COURT: Is it admitted.

9 BY MS. SOUMILAS:

10 Q S-7. Does he make a reference to "I can't
 11 sit by and watch my people get slaughtered"?

12 A That's correct.

13 Q Okay. And what's underneath that, if you
 14 could tell us.

15 A So underneath of that is the post made by Robert
 16 Bowers.

17 Q And who is Robert Bowers?

18 A He is the individual who, in October of 2018,
 19 attacked the Tree of Lights Synagogue in Pittsburgh.
 20 And before Robert Bowers went into the synagogue in
 21 Pittsburgh, he posted onto Gab. It was like his last
 22 post. And he said this exact quote, "I can't sit by
 23 and watch my people get slaughtered."

24 Q So he's in -- and when David Greco says "I
 25 can't sit by and watch people get slaughtered," he puts

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1 that in quotes; is that correct?

2 A That is correct.

3 Q And he actually re-posts Robert Bowers' post;
4 is that correct?

5 A That's correct. David Greco and Robert Bowers
6 were friends on Gab.

7 Q Prior to --

8 A Prior to the Tree of Life shooting --

9 Q Okay.

10 A -- at the synagogue.

11 Q And how were you able to determine that?

12 A The FBI office out of Pittsburgh served legal
13 process on Gab. And anybody who was in direct
14 connection with Mr. Bowers was -- any field office was
15 sent notification of that relationship and we call it a
16 lead, meaning, you know, please investigate this in
17 connection to Mr. Bowers' case in Pittsburgh.

18 Q Okay. So this is something that occurs, this
19 post. Do you have the date on there?

20 A I do not.

21 Q Do you recall approximately when you were
22 able to locate that?

23 A I believe this was located some time -- it was
24 some time after the Tree of Life shooting.

25 Q But prior to your interview of --

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1 A But prior to my interview.

2 Q So between October of 2018 and August 5th of
3 2019?

4 A Yes, that's correct.

5 Q Okay. Thank you.

6 A Okay.

7 Q Okay. Now, S-8. Was this something that you
8 were able to --

9 THE COURT: S-7 is in evidence, by the way,
10 counsel.

11 MS. SOUMILAS: Okay. Thank you. I'm sorry,
12 Your Honor.

13 BY MS. SOUMILAS:

14 Q S-8, something that you were able to print
15 out and bring with you today?

16 A That's correct.

17 Q And that's a 2D. What does 2D mean?

18 A That means two days ago.

19 Q Okay. So you brought it with you. Did you
20 print it out yesterday?

21 A I printed these out last night. Yes.

22 Q So then the date on S-8 would be the 4th
23 then?

24 A That's correct.

25 Q Okay. Let me just look at that. September

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1 Q Which is part of?
 2 A That is the -- it's the section of Gloucester
 3 Township.
 4 Q Okay. So it's not Somerdale, the Town of
 5 Somerdale?
 6 A No.
 7 Q Okay.
 8 A No.
 9 Q So we could just say the Somerdale section
 10 of --
 11 A Of Gloucester Township.
 12 Q -- Gloucester Township.
 13 A Correct.
 14 MS. SOUMILAS: And that's important, Judge,
 15 for the jurisdictional filing purposes.
 16 THE COURT: Yes.
 17 MS. SOUMILAS: Okay.
 18 BY MS. SOUMILAS:
 19 Q Definitely Gloucester Township?
 20 A Yes.
 21 Q All right.
 22 A Yes.
 23 Q And have you been monitoring the posts?
 24 A Yes. Information that I've received from the
 25 Prosecutor's Office, as well as the detective, and our

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1 own intel unit.
 2 Q The detective who just testified?
 3 A Yes.
 4 Q And were they of the nature that we just set
 5 forth in Exhibits S-1 through S-15?
 6 A Yes.
 7 Q Was there anything that you have seen which
 8 would indicate a change of position by David Greco in
 9 recent days or weeks that do not espouse anti-Semitism?
 10 A No. His posts seem to become pointed to --
 11 towards more violence.
 12 Q Okay. When you went to the home, was there a
 13 dog?
 14 A Yes, a small dog.
 15 Q Okay. And what kind of door was it?
 16 A I believe it was a solid wood door with --
 17 Q Okay.
 18 A -- with a glass screen door in front.
 19 Q Okay. And how many -- there's been some
 20 testimony that officers went around the house. How
 21 many points of entry or exit is there?
 22 A There's a front door. I believe that there is a
 23 door on the delta division if you're looking out the
 24 front on the right side of the house, as well as a rear
 25 enclosed patio with two -- one rear slider.

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1 Q So there's a back door, a front door, and a
2 door on one of the sides of the home.

3 A Correct.

4 Q So there's three points of entry or exit.

5 A Yes.

6 Q Is it a two-story home?

7 A Yes.

8 Q And are there windows on the second story
9 that would look out --

10 A Yes.

11 Q -- onto the street?

12 A Yes.

13 Q Would that make it known if law enforce-
14 ment --

15 A Yes.

16 Q -- was coming?

17 A Yes.

18 Q Okay. If the Court were to grant a petition
19 here for a seizure of the firearms, do you have
20 concerns regarding having to knock and announce prior
21 to making that entry?

22 A Yes.

23 Q Is that in any way based on your interaction
24 on August the 5th, where you knocked and announced and
25 David Greco didn't open the door?

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1 A Yes. Between him -- failure to open the door,
2 being at the residence, as well as specifically the
3 rifle that he has possession of.

4 Q And the handgun or just the rifle?

5 A Well, the handgun as well, but the rifle too.

6 Q Okay. Can you tell us how long you were
7 waiting out there with law enforcement in uniform from
8 the time you started knocking on the door until the
9 time when the parents came and let you in?

10 A Seven to ten minutes.

11 Q Seven -- so in that time, you believe David
12 Greco was in the house?

13 A Yes.

14 Q And at that time, you had at least some
15 information that he had weapons registered to him?

16 A Yes.

17 Q Did that pose a security -- a safety concern
18 for you?

19 A Absolutely.

20 Q And do you believe that if a no-knock warrant
21 were granted in this case that that would alleviate
22 some of that security concern, given his evasiveness
23 and unwilling to open the door when you went the first
24 time?

25 A Absolutely.